

MILMAN LABUDA LAW GROUP PLLC

3000 MARCUS AVENUE
SUITE 3W8
LAKE SUCCESS, NY 11042

TELEPHONE (516) 328-8899
FACSIMILE (516) 328-0082

November 22, 2021

VIA ECF

United States District Court
Southern District of New York
Attn: Hon. Lorna G. Schofield, U.S.D.J.
40 Foley Square, Courtroom 1106
New York, NY 10007-1312

Re: Edelman v. NYU Langone Health System, et al.
Case No.: 1:21-cv-502 (LGS) (GWG)
MLLG File No.: 209-2020

Dear Judge Schofield:

This firm represents the Plaintiff Dr. Sari Edelman (hereinafter “Plaintiff” or “Dr. Edelman”) in the above-referenced case. The parties write jointly pursuant to the Court’s Order (ECF Docket Entry 68) requesting that the parties file a letter proposing a date for the deposition of Dr. Andrew Porges (hereinafter “Dr Porges”). The parties have confirmed the deposition of Dr. Porges for December 10, 2021.

The parties respectfully submit the following remaining deposition schedule in addition to that of Dr. Porges:

November 22, 2021	Dr. Kavini Mehta, which is currently underway
November 29, 2021	Miriam Ruiz
To be determined	Dr. Avram Goldberg (hereinafter “Dr. Goldberg”) ¹
To be determined	Dr. Joseph Taverni

Plaintiff respectfully submits that the deposition of Dr. Goldberg is necessary based on conflicting testimony provided by witnesses and Defendants previously deposed. Further, Plaintiff has had trouble serving Dr. Joseph Taverni with a subpoena but expects that service will be completed before the end of next week.

The parties thank this honorable Court for its time and attention to this case, and look forward to completing discovery expeditiously.

¹ Dr. Goldberg is to be deposed at Plaintiff’s request. Defendants must confirm Dr. Goldberg’s availability between now and the close of discovery. The parties will work together to secure a mutually agreeable date for same.

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Respectfully submitted,

MILMAN LABUDA LAW GROUP PLLC

By: /s/ Emanuel Kataev, Esq.

Joseph M. Labuda
Emanuel Kataev
3000 Marcus Avenue, Suite 3W8
Lake Success, NY 11042-1073
(516) 328-8899
joe@mlaborlaw.com
emanuel@mlaborlaw.com
Attorneys for Plaintiff

TARTER KRINSKY & DROGIN LLP

By: /s/ Richard L. Steer

Richard L. Steer
Tara T. Carolan
1350 Broadway, 11th Floor
New York, NY 10018
(212) 216-8000
rsteer@tarterkrinsky.com
tcarolan@tarterkrinsky.com
Attorneys for Defendants